



AT&T Kentucky
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July 18, 2008

RECEIVED

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PUBLIC SERVICE
COMMISSION

VIA FEDERAL EXPRESS

Ms. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: South Central Telcom LLC, Complainant v. BellSouth
Telecommunications, Inc., Defendant
PSC 2006-00448

Dear Ms. Stumbo:

Enclosed for filing in the above-captioned case are the original and six (6) copies of BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky's Supplemental Response to Item No. 5 of South Central Telcom's Initial Requests for Information, Requests for Admission and Requests for Production of Documents.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

Enclosures

cc: Party of Record

716227

CERTIFICATE OF SERVICE FOR 2006-00448

It is hereby certified that a true and correct copy of the foregoing was served on the following individual by mailing a copy thereof on the 18th day of July, 2008.

John E. Selent
Dinsmore & Shohl LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202


Mary K. Keyer

REQUEST: Please identify the date(s) upon which BellSouth requested interconnection with South Central.

RESPONSE: In addition to AT&T Kentucky's original response to this request, AT&T Kentucky has since discovered documents indicating that in 2005 AT&T Kentucky had email exchanges with South Central Telcom and sent to South Central Telcom a copy of a traffic exchange agreement. AT&T Kentucky has attached the documents that support this response.

KPSC
Docket No. 2006-00448

AT&T Kentucky's
Supplemental Attachment to
First Set of Data Requests

Item No. 5

-----Original Message-----

From: Donnie Bennett [mailto:Donnie_Bennett@scrtc.net]
Sent: Thursday, November 03, 2005 4:05 PM
To: Alford, Buck
Cc: Chris Lawrence; Forrest Wilson
Subject: RE: Payment of Access Traffic

Buck,

I have not received confirmation of any positive results from your efforts to procure payment of our outstanding CABs bills. Since another month has passed and there seems to be a refusal by BellSouth to make compensation for its traffic, we must insist that payment of access charges billed in accordance with filed and approved tariffs be promptly made.

Thanks,

Donnie C. Bennett
Regulatory & Customer Service Mngr.
South Central Rural Tel. Coop. Corp. Inc.
Ph. 270-678-8225, Cell. 270-670-5959
Fax. 270-678-3030

-----Original Message-----

From: Alford, Buck [mailto:buck.alford@bellsouth.com]
Sent: Wednesday, October 12, 2005 2:08 PM
To: Donnie Bennett
Cc: Chris Lawrence; Forrest Wilson
Subject: RE: Traffic exchange agreement

Donnie,

Thanks for your response, and thank you for the copies of the 2003 Orders regarding the dispute between AT&T and Brandenburg. I understand your concerns and assure you that I'm working to resolve the BST-SCT matter as expeditiously as possible. Can you shed any light on this "verbal agreement between BellSouth and SCT?"

Thanks,
Buck

-----Original Message-----

From: Donnie Bennett [mailto:Donnie_Bennett@scrtc.net]
Sent: Tuesday, October 11, 2005 8:25 AM
To: Alford, Buck
Cc: Chris Lawrence; Forrest Wilson
Subject: RE: Traffic exchange agreement

7/18/2008

Mr. Alford,

BellSouth under a verbal agreement between BellSouth and SCT has terminated SCT CLEC traffic via SCRTC ILEC Intra-LATA trunks. SCT has billed access on this traffic pursuant to its PSC-approved access tariff. If there are services or arrangements that BellSouth wishes to establish that are not addressed by our access tariff, I would be happy to review any such request however at this time I must insist that you promptly pay any outstanding amounts at this time.

For your information, I have attached a 2002 ATT decision in this matter.

Donnie C. Bennett
Regulatory & Customer Service Mngr.
South Central Rural Tel. Coop. Corp. Inc.
Ph. 270-678-8225, Cell. 270-670-5959
Fax. 270-678-3030

-----Original Message-----

From: Alford, Buck [mailto:buck.alford@bellsouth.com]
Sent: Monday, October 10, 2005 10:27 AM
To: Donnie Bennett
Subject: Traffic exchange agreement

Mr. Bennett,

Attached is the exchange-of-traffic agreement I referred to in my voice message last week. Rather than a comprehensive interconnection agreement, this is simply a trimmed down version to govern traffic exchange between BellSouth and CLECs operating in a non-competitive environment. I've included several documents:

GTC.doc -- General Terms and Conditions
Att 1 Interconnection.doc -- T&Cs of traffic exchange
Att 1 rates.xls -- Rates for traffic exchange
Att 2 Billing.doc -- Billing T&Cs
Att 2 rates.xls -- Billing rates

As I said, I'd like to work through this agreement so that we can clearly establish how our companies will exchange traffic going forward. On a parallel track, I'll do all that I can to help ensure prompt settlement of prior invoices. Please let me know when you may have time to discuss in greater detail. I look forward to working through this with you.

Thanks,

Buck Alford
Negotiations Manager
BellSouth Interconnection Services

<<GTC.doc>> <<Att1 Interconnection.doc>> <<Att1 Interconnection rates.xls>> <<ATT2 Billing.doc>>
<<ATT2 Billing rates.xls>>

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